

U.S. Department of Justice

United States Attorney District of New Jersey

Economic Crimes Unit

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November 18, 2011

ELECTRONIC MAIL TO keara waldron@njd.uscourts.gov

The Honorable Dennis M. Cavanaugh United States District Judge Lautenberg United States Courthouse Federal Square Newark, New Jersey 07102

Re: United States v. Morton Salkind

Crim. No. 08-383 (DMC)

Violation of Supervised Release

Dear Judge Cavanaugh:

The United States respectfully requests a 60-day continuance of the sentencing in the above-referenced matter, which is currently scheduled for Monday, November 21 at 9:30 a.m.

As grounds for the continuance, the United States recently learned from the London Metropolitan Police Service ("the Met") that the Met seized approximately \$113,000 in cash from a safe deposit box at the Harrods department store in the name of Morton and Carol Salkind. Mr. Salkind never disclosed the existence of those funds to the Court, the Probation Office, or the United States, and only recently disclosed them to the trustee assigned to Mr. Salkind's bankruptcy. The trustee has requested additional time to question Mr. Salkind about these and other assets that may properly belong to the bankruptcy estate, consistent with the Court's May 18, 2011 order that Mr. Salkind cooperate with the trustee's investigation.

Counsel for Mr. Salkind has kindly consented to the requested relief. The parties are available at the Court's convenience in January.

Respectfully submitted,

PAUL J. FISHMAN United States Attorney

/s/Seth B. Kosto

By: SETH B. KOSTO Assistant U.S. Attorney

cc: Raymond Flood, Flood & Basile, counsel to Morton Salkind (electronic mail with exhibits by e-mail) Kathy Youngman, Esq., bankruptcy trustee Jessica Alberts, United States Probation Officer

SO ORDERED:

DENNIS M. CAVANAJUĆ